

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c)	
Robert Manchel, Esq. 1 Eves Drive, Suite 111 Marlton, NJ 08053 Attorney for Debtor RM-1141	
In Re: Justice Watts	Case No. 19-28370JNP
	Judge: Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT
TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following (choose one):

1. _____ Motion for Relief from the Automatic Stay filed by _____, creditor. A hearing has been scheduled for _____, at _____ a.m.

OR

_____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for _____ at _____ a.m.

OR

_____X Certification of Default filed by Rushmore Loan Management Services LLC, creditor. I am requesting that a hearing be scheduled on this matter.

OR

_____ Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

Other: I will cure the arrears by making a \$9,000.00 payment prior to 1/5/2023, with the balance paid over a 12 month period, by making equal monthly payments. I will continue to make my regular monthly payments, as well. I respectfully request that the movant's motion be denied so that I may cure the arrears and continue with my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 12/21/2022

/s/ Justice Watts
Justice Watts, Debtor